

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et.al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**APPLICATION OF DELAWARE COUNSEL
TO APPEAR PURSUANT TO LOCAL RULE 9010-1(e)(ii)**

I, Kristhy M. Peguero, Esquire, respectfully request the approval of this Court to appear in the above-captioned cases on behalf of Burlington Stores, Inc. pursuant to Rule 9010-1(e)(ii) of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”). Local Rule 9010-1(e)(ii) provides:

Attorneys who are admitted to the Bar of the District Court and in good standing, but who do not maintain an office in the District of Delaware, may appear on behalf of parties upon approval by the Court.

I am admitted to and in good standing with the Bar of the United States District Court for the District of Delaware. I do not maintain an office for the practice of law in the District of Delaware. My office is located in Houston, Texas at the address indicated in my signature block below.

I respectfully request that the Court enter the proposed order attached hereto as **Exhibit A** approving my appearance in these cases pursuant to Local Rule 9010-1(e)(ii).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Dated: June 20, 2025

JACKSON WALKER LLP

/s/ Kristhy M. Peguero

Kristhy M. Peguero (DE 4903)
1401 McKinney Street, Suite 1900
Houston, TX 77010
Telephone: (713) 752-4200
Email: kpeguero@jw.com

Counsel for Burlington Stores, Inc.